

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSE and ROSE MEJIA and)	
OSMAN and AZRA ZHIROVIC,)	
)	
Plaintiffs,)	
)	
v.)	No. 08 C 1386
)	
AMERIQUEST MORTGAGE COMPANY,)	Judge Kennelly
and DEUTSCHE BANK NATIONAL TRUST)	
COMPANY,)	
)	
Defendants.)	

**DEFENDANTS' (AGREED) MOTION FOR EXTENSION OF TIME TO FILE
RESPONSIVE PLEADINGS TO PLAINTIFFS' COMPLAINT**

Defendants, Ameriquest Mortgage Company and Deutsche Bank National Trust Company (“Defendants”), move, with the agreement of Plaintiffs, for an extension of time to file Defendants’ responsive pleadings to Plaintiffs’ complaint. In support of their motion, Defendants state as follows:

1. There is pending in the U.S. District Court for the Northern District of Illinois the MDL proceeding In re Ameriquest Mortgage Co., Mortgage Lending Practices Litigation, MDL Docket No. 1715, Lead Case No. 05 C 7097 (Aspen, J.) (“Ameriquest MDL Litigation”). The Ameriquest MDL Litigation includes many individual and putative class lawsuits challenging loans originated by Ameriquest Mortgage Company.

2. Defendants will file this week before Judge Aspen, the presiding judge of the Ameriquest MDL Litigation, Defendants' motion for reassignment of related action, requesting the reassignment of this lawsuit to the Ameriquest MDL Litigation. Plaintiffs agree to the reassignment of this lawsuit to the Ameriquest MDL proceeding. Judge Aspen has found other similar lawsuits to

be appropriate related actions and has reassigned hundreds of individual lawsuits to the Ameriquest MDL Litigation.

3. Defendants anticipate that Judge Aspen will find this lawsuit, as Judge Aspen has found other lawsuits, to be an appropriate related action and will reassign this lawsuit to the Ameriquest MDL Litigation.

4. The Judicial Panel on Multidistrict Litigation established the Ameriquest MDL Litigation to create certain litigation efficiencies. Anticipating the reassignment of this lawsuit to the Ameriquest MDL Litigation, Defendants request an extension of time to file their responsive pleadings to Plaintiffs' complaint until 30 days after the lawsuit is reassigned to the Ameriquest MDL proceeding (so that Defendants may enjoy the efficiencies of the Ameriquest MDL Litigation and may file their responsive pleadings to Plaintiffs' complaint in the Ameriquest MDL Litigation).

WHEREFORE, Defendants, Ameriquest Mortgage Company and Deutsche Bank National Trust Company, respectfully request this Court to grant their motion and to extend the time for Defendants to file their responsive pleadings to Plaintiffs' complaint until 30 days after the lawsuit is reassigned to the Ameriquest MDL proceeding (or, if Judge Aspen surprisingly denies Defendants' motion for reassignment, then 30 days after Judge Aspen's denial).

Dated: March 31, 2008

Respectfully submitted,

AMERIQUEST MORTGAGE COMPANY and
DEUTSCHE BANK NATIONAL TRUST
COMPANY, Defendants

By: s/ Jonathan N. Ledsky

One of their Attorneys

Craig A. Varga
Jonathan N. Ledsky
Varga Berger Ledsky Hayes & Casey
A Professional Corporation
224 South Michigan Avenue
Suite 350
Chicago, Illinois 60604
(312) 341-9400

CERTIFICATE OF SERVICE

Jonathan N. Ledsky, an attorney, hereby certifies that a true and correct copy of the foregoing **Defendants' (Agreed) Motion for Extension of Time to File Responsive Pleadings to Plaintiffs' Complaint** was served electronically upon counsel of record:

Anthony P. Valach, Jr. (anthonyvalach@sbcglobal.net)
Daniel Mark Harris (lawofficedh@yahoo.com)

this 31st day of March, 2008.

s/ Jonathan N. Ledsky